

RPD:JJD  
F#2008R0

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(T. 49, U.S.C., §§  
46505(b)(1) and (3))

STEVEN NOBLES,

**FILED**

Defendant.

IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

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★ OCT 16 2008 ★

EASTERN DISTRICT OF NEW YORK, SS:

**LONG ISLAND OFFICE**

JAMES MCCARTHY, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), duly appointed according to law and acting as such.

Upon information and belief, on or about October 16, 2008, the defendant STEVEN NOBLES did knowingly and intentionally attempt to get on an aircraft in, or intended for operation in air transportation, and did have on his person and in his property a concealed dangerous weapon, to wit: a 7" folding knife, that would be accessible to him in flight.

(Title 49, United States Code, Section 46505(b)(1)).

Upon information and belief, on or about October 16, 2008, the defendant STEVEN NOBLES did knowingly and intentionally attempt to place an explosive and incendiary device, to wit: a pipe bomb and fireworks, on an aircraft.

(Title 49, United States Code, Section 46505(b)(3)).

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. I have been a Special Agent with the FBI for approximately 18 years, during which I have participated in various investigations involving counter-terrorism and other violent crimes. During those investigations, I have conducted interviews, physical and electronic surveillance, and airport security searches and screening operations. Further, as an FBI agent, I have participated in numerous investigations during the course of which I have used investigative techniques to secure relevant information regarding the transportation of weapons or explosive devices at airports. The information contained in this affidavit is based on discussions with other Special Agents and law enforcement officers, and a review of the evidence related to this investigation.

2. On October 16, 2008 at approximately 7:08 a.m., the defendant STEVEN NOBLES attempted to pass through a security checkpoint at MacArthur Airport, located in Islip, New York ("MacArthur Airport"). The defendant had a one-way ticket to fly from MacArthur Airport to Las Vegas, Nevada on Southwest Airlines, Flight 384.

3. During a routine security screening of the defendant STEVEN NOBLES's carry-on items, Transportation Security

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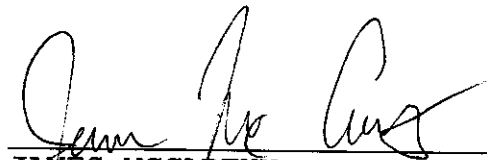
<sup>1</sup> Because the purpose of this Complaint is solely to set forth probable cause to arrest the defendant, I have not set forth all facts concerning this investigation of which I am aware.

Administration ("TSA") security officers observed a knife in the defendant's bag. The officers then searched the bag and discovered a 7" folding knife (consisting of a 3" blade and a 4" handle) and a device, which appears to be a pipe bomb, in the defendant's carry-on bag. At that time, law enforcement authorities were notified and portions of the MacArthur Airport were evacuated.

4. Subsequently, law enforcement authorities and TSA security officers searched the defendant STEVEN NOBLES' checked luggage and discovered a number of items, including explosive fireworks, electrical circuit boards, a battery with electrical tape and 14 hilti powder drive pin loads, which are .22 caliber rounds used in a nailgun to drive nails into concrete.

5. The defendant STEVEN NOBLES was advised of his Miranda rights and, after being advised of his rights, he agreed to speak to law enforcement officers. The defendant stated, in sum and substance, that (a) the device in his carry-on bag was a pipe bomb; (b) he built the pipe bomb using a metal pipe, fuses and gunpowder from M-80 fireworks, smokebombs and other fireworks; and (c) he intended that, upon detonation, the device would "cause a giant smoke cloud, a flash of light and hopefully a loud noise." The defendant denied intending to detonate the pipe bomb on the airplane and claimed that he had inadvertently carried it to the airport.

WHEREFORE, your deponent respectfully requests that the defendant STEVEN NOBLES be dealt with according to law.

A handwritten signature in black ink, appearing to read 'James McCarthy', is written over a horizontal line.

JAMES MCCARTHY  
Special Agent  
Federal Bureau of Investigation

Sworn to before me this  
16<sup>th</sup> day of October 2008

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UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK